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Attorneys for Plaintiffs
TACSIS APC and KENT LIMSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TACSIS APC, a California corporation;
and KENT LIMSON, an individual,

Plaintiffs
v.

JACKIE ROBINSON, an individual; ALL
NET LAND DEVELOPMENT, LLC, a
Nevada Limited Liability Company; ALL
NET, LLC, a Nevada Limited Liability
Company; DRIBBLE DUNK, LLC, a
Nevada Limited Liability Company; AGS
ASSURETY, LLC, a Nevada Limited
Liability Company; TIMOTHY J.
ARELLANO, an individual; DAVID
LOWDEN, an individual; MESSNER
REEVES LLP, a Colorado Limited
Liability Partnership; TORBEN WELCH,
an individual; LORING JACOBS, an
individual, and DOES 1 THROUGH 100
INCLUSIVE,

Defendants.

Case No: 2:24-cv-02284-RFB-EJY

**PLAINTIFFS' RESPONSE TO MINUTE
ORDER AND TO DEFENDANT, LORING
JACOBS' MOTION FOR CONTINUANCE**

TO THE COURT AND ALL PARTIES OF RECORD:

COMES NOW, Plaintiffs TACSIS APC and KENT LIMSON, by and through their counsel of record, and hereby respond to this Court's Minute Order dated January 22, 2025 [ECF 16] and to Defendant, LORING JACOBS' Motion for Continuance as follows:

1. Plaintiffs filed their complaint [ECF 1] on December 10, 2024 and served Defendant LORING JACOBS ("JACOBS") on December 30, 2024. Defendant JACOBS' response to the complaint was initially due by January 20, 2025.

2. On January 21, 2025, Defendant JACOBS filed his Motion for Continuance [ECF 15] requesting a 30-day extension to retain Gary S. Lincenberg of the law firm BIRD, MARELLA, RHOW, LINCENBERG, DROOKS & NESSIM LLP.

3. On January 22, 2025, the court issued a Minute Order [ECF 16] for Plaintiffs to advise the Court if an extension had been granted by January 31, 2025. On the same day of the issuance of the Minute Order, Plaintiffs' counsel contacted Defendant JACOBS and his prospective counsel by email and agreed to a 21-day extension, making Defendant JACOBS' response due no later than February 11, 2025.

4. Since all of the other defendants have been served at or around the same time, it was determined that a shorter extension will help facilitate an efficient resolution of this lawsuit and conserve the Court's resources.

DATE: January 31, 2025

TACSIS LAW APC

By: /s/ John S. Manzano
John S. Manzano, Esq.
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

Pursuant to Federal Rules of Civil Procedure 5 and Local Rule 5-1, I certify that I am an employee of TACSIS LAW APC, and that on January 31, 2025, the foregoing **PLAINTIFFS' RESPONSE TO MINUTE ORDER AND TO DEFENDANT, LORING JACOBS' MOTION FOR CONTINUANCE**, was served upon the following respective parties via CM/ECF system as follows:

<p>HANRATTY LAW GROUP Kevin M. Hanratty, Esq. (SBN 007734) 1815 Village Center Circle, Suite 140 Las Vegas, NV 89134 T: (702) 821-1379 Email: kevinh@hanrattylawgroup.com</p> <p><i>Attorneys for Defendants, ALL NET LAND DEVELOPMENT, LLC and DAVID G. LOWDEN</i></p>	<p>LORING JACOBS 1 Hughes Center, Unit 904 Las Vegas, NV 89169 T: (702) 735-7928 Email: Waynerland2@icloud.com</p> <p><i>Defendant, In Pro Per</i></p>
<p>JACKIE ROBINSON 2300 W. Sahara Blvd, Suite 800 Las Vegas, NV 89102 T: (702) 856-4440 Email: jackierob@embarqmail.com</p> <p><i>Defendant, In Pro Per</i></p>	<p>GORDON REES SCULLY & MANSUKHANI John M. Palmeri, Esq. 555 Seventeenth Street, Ste. 3400 Denver, CO 80202 T: (303) 534-5145 Email: jpalmeri@grsm.com</p> <p><i>Attorneys for MESSNER REEVES LLP and TORBEN WELCH</i></p>
<p>BIRD, MARELLA, RHOW, LINCENBERG DROOKS & NESSIM LLP Gary S. Lincenberg, Esq. 1875 Century Park East, 23rd Floor Los Angeles, CA 90067-2561 T: (310) 201-2100 Email: glincenberg@birdmarella.com</p> <p><i>Courtesy Copy on behalf of Defendants, LORING JACOBS, JACKIE ROBINSON, ALL NET, LLC and DRIBBLE DUNK, LLC</i></p>	

/s/: Nancy Steelman
An Employee of TACSIS LAW APC

PLAINTIFFS' RESPONSE TO MINUTE ORDER AND TO DEFENDANT, LORING JACOBS' MOTION FOR CONTINUANCE